

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

NADIM AHMED,

Defendant.

Deferred Prosecution Agreement

23 Mag. 563

TO: NADIM AHMED

On January 23, 2023, a criminal complaint was issued by a United States Magistrate Judge in the Southern District of New York, in which you are accused of committing an offense against the United States, to wit, interstate transportation of stolen property, in violation of 18 U.S.C. § 2314 & 2. However, after a thorough investigation, it has been determined that the interest of the United States of America and your own interest will be best served by deferring prosecution in this District. Prosecution will be deferred during the term of your good behavior and satisfactory compliance with the terms of this agreement for the period of six months from the signing of this agreement. The terms and conditions constituting your good behavior and satisfactory compliance are as follows:

- (1) You shall refrain from the violation of any law (federal, state and local). You shall immediately contact your U.S. Pretrial Services Officer if arrested or questioned by a law-enforcement officer.
- (2) You shall associate only with law-abiding persons.
- (3) You shall work regularly at a lawful occupation and/or regularly attend school and support your legal dependents, if any, to the best of your ability. When out of work or not attending school you shall notify your supervising U.S. Pretrial Services Officer immediately. You shall consult him or her prior to job and school changes.
- (4) You shall not leave continental United States without permission of your supervising U.S. Pretrial Services Officer.
- (5) You shall notify your supervising U.S. Pretrial Services Officer immediately of any change in your place of residence.
- (6) You shall follow your supervising U.S. Pretrial Services Officer's instructions and advice.
- (7) You shall report to your supervising U.S. Pretrial Services Officer as directed.

As a further condition you hereby consent to disclosure, by any federal, state or local government agency, or by any medical or substance abuse treatment provider, to the U.S. Pretrial Services Officer supervising your case, of such medical and treatment records as may be requested by the Pretrial Services Officer to evaluate deferral of prosecution in this case. You further agree that you will execute any additional consent forms that any such agency or provider may require to release such information.

Special conditions are as follows:

- (1) By signing this Agreement, you, Nadim Ahmed, hereby consent to the administrative forfeiture of the amount of \$106,254.92 (the "Forfeiture Amount"), and agree that you will not file a claim or a petition for remission, restoration, or mitigation or otherwise contest the administrative forfeiture of the Forfeiture Amount, and will not assist anyone else in doing so. The Forfeiture Amount shall be wired to the Federal Bureau of Investigation consistent with wiring instructions to be provided by the Government to you and will be deposited in the Seized Asset Depository Fund.
- (2) You agree to pay the Forfeiture Amount on or before October 1, 2025.
- (3) You release any and all claims you may have to the Forfeiture Amount, agree that the forfeiture of such funds may be accomplished administratively, and waive the requirements of any applicable laws, rules, or regulations governing the forfeiture of assets, including service and notice of the forfeiture.
- (4) You agrees to waive all constitutional and statutory challenges in any manner to any forfeiture carried out in accordance with this Agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment. You agree to take any and all steps as requested by the United States to pass clear title to the Forfeiture Amount to the United States.
- (5) You agree to sign any additional documents necessary to complete forfeiture of the Forfeiture Amount.
- (6) You warrant that you are the sole owner of all of the Forfeiture Amount, and agree to hold the United States, its agents and employees harmless from any claims whatsoever in connection with the seizure or forfeiture of the Forfeiture Amount covered by this agreement.
- (7) You agree to testify truthfully and to cooperate in any administrative forfeiture proceeding relating to the Forfeiture Amount. This consent to forfeiture may be incorporated into an order of administrative forfeiture. Subsequent to the date hereof, any violation of any term or representation contained herein relating to the forfeiture of the Forfeiture Amount shall be construed as a violation of this Agreement. You agree to receive notice of documents via your attorneys, Jason Gottlieb, Esq. and Genny Ngai, Esq. of Morrison Cohen LLP 909 Third Avenue, 27th Floor, New York, NY 10022-4784.

The United States Attorney may at any time revoke or modify any condition of this provisional release or change the period of such supervision. The United States Attorney may discharge you from supervision at any time. The United States Attorney may at any time proceed with the prosecution for this offense should the United States Attorney, in his or her sole discretion, deem such action advisable.


If upon completion of your supervision a written report from your supervising U.S. Pretrial Services Officer is received to the effect that you have complied with all the rules, regulations and conditions and special conditions applicable to your deferred prosecution, no further prosecution will be instituted in this District for the above offense.

If you successfully complete the term of supervision and fulfill all the terms and conditions of this Agreement, the United States Attorney will move the Court to dismiss the Complaint against you.

It is further understood that this Agreement and the terms and conditions set forth herein are limited to the facts and circumstances of this case and lack precedential value.

Dated: New York, New York
July 1, 2025

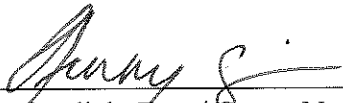
JAY CLAYTON
United States Attorney for the
Southern District of New York

By: 
Vladislav Vainberg
Assistant United States Attorney
212-637-1029

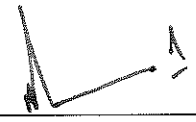
[THIS PORTION OF THE PAGE HAS BEEN INTENTIONALLY LEFT BLANK]

The undersigned hereby consents to the foregoing and expressly waives any and all rights to a speedy trial pursuant to the Sixth Amendment to the United States Constitution, the Speedy Trial Act, 18 U.S.C. §§ 3161 et seq., and any other pertinent provisions, and consents to the adjournment of all pending proceedings in this case. The undersigned further waives the applicable statute of limitations with respect to any prosecution that is not time-barred on the date that this agreement is signed. It is the intent of this provision to toll the applicable statute of limitations during the pendency of the deferred prosecution.

Dated: New York, New York
July 11, 2025



Jason Gottlieb, Esq. / Genny Ngai, Esq.
Attorney for Defendant



Nadim Ahmed
Defendant

Pursuant to 18 U.S.C. §3161(h)(2), exclusion under the Speedy Trial Act of the period of time during which the prosecution of the defendant is deferred pursuant to this agreement is hereby approved.

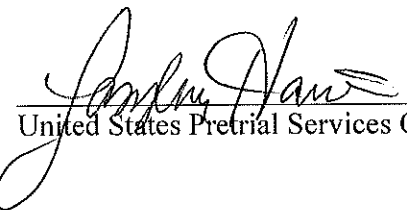
Dated: New York, New York
July 11, 2025



United States Magistrate Judge

The undersigned hereby consents to the foregoing and will accept supervision of the above-named defendant on the conditions set forth herein.

Dated: New York, New York
July 11, 2025



United States Pretrial Services Officer